2023R00007/NKP/PJK

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

Hon.

Crim. No. 25-00453-001 (RMB)

21 U.S.C. § 846

ABDUL QADIR

v.

INFORMATION

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

Beginning at least in or around November 2020, and continuing through in or around July 2024, in Atlantic County, in the District of New Jersey and elsewhere, the defendant.

ABDUL QADIR,

did knowingly and intentionally conspire and agree with others to distribute and dispense, outside the usual course of professional practice and not for a legitimate medical purpose, mixtures and substances containing detectable amounts of Schedule II controlled substances, namely oxycodone, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

In violation of Title 21, United States Code, Section 846.

FORFEITURE ALLEGATION

As a result of committing a controlled substance offense charged in this Information, the defendant, ABDUL QADIR, shall forfeit to the United States of America, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in this Information.

Substitute Assets Provision

If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty,

the United States intends, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of

any other property of the defendant up to the value of the above-described forfeitable property.

ALINA HABBA

United States Attorney

LORINDA LARYEA

Acting Chief

Criminal Division, Fraud Section

NICHOLAS K. PEONE

PAUL J. KOOB

Trial Attorneys

Criminal Division, Fraud Section

U.S. Department of Justice

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UNITED STATES OF AMERICA

 \mathbf{v} .

ABDUL QADIR

INFORMATION FOR

21 U.S.C. § 846 21 U.S.C. § 841(a)(1) and (b)(1)(C)

ALINA HABBA

UNITED STATES ATTORNEY FOR THE DISTRICT OF NEW JERSEY

> NICHOLAS K. PEONE PAUL J. KOOB TRIAL ATTORNEYS NEWARK, NEW JERSEY (202) 923-7818